

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Britt Industries, Inc.
Attn: Bill Schroll
3010 Malmo Road
Arlington Heights, Illinois 60005

<u>Application No.:</u> 98060061	<u>I.D. No.:</u> 031403AAC
<u>Applicant's Designation:</u> COATING	<u>Date Received:</u> October 8, 2003
<u>Subject:</u> Coating Operations	
<u>Date Issued:</u> July 12, 2006	<u>Expiration Date:</u> July 12, 2011
<u>Location:</u> 3010 Malmo Road, Arlington Heights	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of fuel combustion equipment (air make-up unit, three-stage washer burner, dry-off oven, curing oven, batch oven, burn-off oven with afterburner), spray booths (1-5) with filters, three-stage washer, and clean up operations pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
 - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year of volatile organic material, 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs). As a result, the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit.
 - ii. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) for this location.
- 2a. Pursuant to 35 Ill. Adm. Code 218.205(b)(1), the daily weighted average VOM content of the "baked" coatings applied in the five spray booths shall not exceed 3.3 lb VOM/gal of coating (minus water and any compounds which are exempted from the definition of VOM) as applied at each applicator.

- b. Pursuant to 35 Ill. Adm. Code 218.205(b) (1), the daily weighted average VOM content of the "air dried" coatings applied in the five spray booths shall not exceed 3.5 lb VOM/gallon of coating (minus water and any compounds which are exempted from the definition of VOM) as applied at each applicator.
- 3a. Emissions and operation of the spray booths (1-5) and clean up operations shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Coatings	2.5	19.6	2.5	19.6
Clean Up Solvents	0.6	4.9	0.6	4.9

These limits are based on the maximum material usage and the maximum VOM content of the coating and solvents. Compliance with the annual limits shall be determined from a running total of 12 months of data.

- b. Emissions and operation of the fuel combustion equipment shall not exceed the following limits:

<u>Fuel Usage</u>		<u>Pollutant</u>	<u>Emission Factor</u>	<u>Emissions</u>	
<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>		<u>(Lb/mmscf)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
2.66	21.29	NO _x	100	0.2	1.1
		CO	84	0.2	0.9
		PM	7.6	0.1	0.1
		VOM	5.5	0.1	0.1
		SO ₂	0.6	0.1	0.1

These limits are based on maximum fuel usage and standard emission factors. Compliance with the annual limits shall be determined from a running total of 12 months of data.

- c. Natural gas shall be the only fuel fired in the fuel combustion equipment. Use of any other fuel requires a permit revision.
- d. This permit is issued based on negligible emissions of particulate matter from spray booths (1-5) controlled by filters. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
- e. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the

emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.

- 4a. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
- b. The Permittee shall maintain records of the following items:
 - i. The name and identification number of each coating as applied on each coating line (daily);
 - ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line;
 - iii. The daily-weighted average VOM content of all coatings as applied on each coating line as defined in 35 Ill. Adm. Code 218.104;
 - iv. The amount of each clean up solvent used (gallons or tons/month and gallons or tons/year);
 - v. VOM content of each clean up solvent used (weight % or lbs/gallon);

- vi. Natural gas fuel usage (mmscf/month and mmscf/year); and
 - vii. Monthly and Annual emissions of CO, NO_x, PM, SO₂, VOM and HAP from the source with supporting calculations (tons/month and tons/year).
- c. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 5a. Pursuant to 35 Ill. Adm. Code 218.211(d)(3), the owner or operator of a subject coating line shall notify the Illinois EPA in the following instances:
- i. Any record showing violation of 35 Ill. Adm. Code 218.205 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
 - ii. At least 30 calendar days before changing the method of compliance with this 35 Ill. Adm. Code 218 Subpart F from 35 Ill. Adm. Code 218.205 to 35 Ill. Adm. Code 218.204 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(c)(1) or (e)(1), respectively. Upon changing the method of compliance with 35 Ill. Adm. Code 218 Subpart F from 35 Ill. Adm. Code 218.205 to 35 Ill. Adm. Code 218.204 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(c) or (e), respectively.
- b. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
6. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

If you have any questions on this, please call Ernie Kierbach at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:ELK:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the coating facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels, e.g., 100 tons per year of VOM, 10 tons per year for a single HAP, and 25 tons per year for totaled HAP at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

E M I S S I O N S (Tons/Year)						Single	Total
<u>Emission Unit</u>	<u>CO</u>	<u>NOx</u>	<u>PM</u>	<u>SO2</u>	<u>VOM</u>	<u>HAP</u>	<u>HAPs</u>
Spray Booths (1-5)			0.44		24.4		
Fuel combustion	0.9	1.1	0.10	0.1	0.1		
Totals	0.9	1.1	0.54	0.1	24.5	< 10	< 25

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